

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Mark Lenzi,

Plaintiff,

v.

United States Department of State, and
Antony J. Blinken, United States Secretary of
State,

Defendants.

Case No. 1:21-cv-01371-PTG-IDD

PLAINTIFF'S SUPPLEMENTED EXHIBIT LIST

Pursuant to the Court's August 25, 2022 Rule 16(b) Scheduling Order (ECF No. 38), as amended, and Fed. R. Civ. P. 26(a)(3), Plaintiff Mark Lenzi ("Mr. Lenzi") submits this supplemented exhibit list, attached as **Exhibit A**.

The following statements apply to Mr. Lenzi's exhibit list:

1. Mr. Lenzi has supplemented his initial exhibit list filed on January 18, 2023 (ECF No. 81) to add exhibits PTX-1514 through PTX-1540, which Plaintiff first received after January 18, 2023, and to make clerical corrections to the exhibit list that do not change the substance of any previously-served exhibit.
2. The exhibits listed do not necessarily include any exhibits that Mr. Lenzi might offer to rebut evidence introduced by Defendants at trial or exhibits used to impeach any witness.
3. Some of the exhibits on Mr. Lenzi's exhibit list are documents that are admissible when offered by Mr. Lenzi but are not admissible when offered by Defendants. Thus, by listing an exhibit on their exhibit list, Mr. Lenzi does not concede the

admissibility of such document if offered by Defendants.

4. Mr. Lenzi reserves the right to present any listed exhibit as a “blow up” or enlarged version of the document.
5. Mr. Lenzi reserves the right to present demonstrative exhibits, which are outside the scope of this disclosure, or summaries of voluminous documents.
6. Mr. Lenzi reserves the right to supplement this exhibit list in response to exhibits identified by Defendants on their exhibit list.
7. Mr. Lenzi reserves the right to introduce any non-objectionable exhibit identified by Defendants on their exhibit list as though the exhibit were listed on Mr. Lenzi’s exhibit list.
8. Mr. Lenzi reserves the right to supplement this exhibit list with documents produced after the date of filing of this list, including exhibits produced in response to Mr. Lenzi’s motion to compel regarding ClassNet, which was granted-in-part by the Court (ECF No. 67), and for which the State Department’s review and production of documents remains incomplete.

Respectfully Submitted,

Dated: February 3, 2023

/s/ Christopher A. Suarez

Christopher A. Suarez (94400)
Thomas M. Barba (*admitted pro hac vice*)
Shannon G. Reid (*admitted pro hac vice*)
Steven R. Kaplan (*admitted pro hac vice*)
Step toe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
Telephone: (202) 429-3000
Email: CSuarez@steptoe.com
TBarba@steptoe.com
SReid@steptoe.com
SKaplan@steptoe.com

Kate E. Fisch (*admitted pro hac vice*)
Maria E. Ortiz (*admitted pro hac vice*)
Step toe & Johnson LLP
1114 Avenue of the Americas
New York, NY 10036
Telephone: (212) 506-3900
Email: KFisch@steptoe.com
MOrtiz@steptoe.com

Counsel for Plaintiff Mark Lenzi

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of February, 2023, a copy of the above document was served via ECF on all counsel of record.

/s/ Christopher A. Suarez
Christopher A. Suarez